

1 THE HONORABLE JAMES L. ROBART  
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7 UNITED STATES DISTRICT COURT  
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WESTERN DISTRICT OF WASHINGTON

ADAMA JAMMEH and OUMIE SALLAH,

Plaintiffs,

v.

HNN ASSOCIATES, LLC, GATEWAY, LLC,  
COLUMBIA DEBT RECOVERY, LLC, d/b/a  
GENESIS CREDIT MANAGEMENT, LLC, and  
WILLIAM WOJDAK,

Defendants.

NO. 2:19-cv-00620-JLR

**STIPULATED MOTION AND ORDER TO  
EXTEND BRIEFING SCHEDULE**

**NOTED FOR CONSIDERATION:  
SEPTEMBER 25, 2020  
Without Oral Argument**

**I. STIPULATION**

1. The parties have a mediation in this matter scheduled and confirmed for October  
19, 2020.

2. In an effort to avoid expending resources on briefing that may become moot if  
the parties are able to successfully resolve the matter, the parties ask that the Court extend the  
current deadlines for the remaining briefing on Plaintiffs' supplemental brief in support of class  
certification, including Defendant's Response to Plaintiffs' Supplemental Brief in Support of  
Class Certification and Plaintiffs' Reply in Support of Class Certification (Dkt. No. 106) and the  
supplemental briefing related to Defendant Wodjak's motion for summary judgment (Dkt. No.  
53).

1       3.     If the parties are able to reach a negotiated resolution of the case, they will  
 2 promptly document the agreement and seek the Court's preliminary approval of the agreement  
 3 and proposed notice under Rule 23(e).

4       4.     If the parties are unable to reach an agreement at mediation, the additional time  
 5 requested will allow Plaintiffs to complete their planned depositions in preparation for the  
 6 supplemental briefing on Mr. Wojdak's pending motion for summary judgement and will  
 7 provide time for CDR to prepare its response to Plaintiffs' supplemental submission on whether  
 8 an FDCPA subclass should be certified.

9       5.     Trial in this matter is set for October 12, 2021, and discovery cutoff is June 14,  
 10 2021 (Dkt. No. 101). Extending the current briefing deadlines will not require an amendment of  
 11 the trial date or other case deadlines.

12       6.     Accordingly, the parties request that the Court amend the current briefing  
 13 schedules as follows:

<b>Supplemental briefs on whether a subclass should be certified</b>	<b>CURRENT DEADLINES (Dkt. No. 105)</b>	<b>PROPOSED DEADLINES</b>
CDR's response brief	October 7, 2020	November 2, 2020
Plaintiffs' reply brief	October 14, 2020	November 9, 2020
Submission of Plaintiffs' proposed notice place	20 days after Court's ruling on subclass issue	unchanged

<b>Supplemental briefs on Mr. Wojdak's motion for summary judgment</b>	<b>CURRENT DEADLINES (Dkt. No. 103)</b>	<b>PROPOSED DEADLINES</b>
Complete depositions on individual liability	October 26, 2020	November 20, 2020
Plaintiffs' response brief	November 20, 2020	December 11, 2020
Mr. Wojdak's reply brief	December 11, 2020	January 8, 2021

1 RESPECTFULLY SUBMITTED AND DATED this 28th day of September, 2020.

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*Attorneys for Columbia Debt Recovery, LLC and  
William Wojdak*

## II. ORDER

Based on the foregoing Stipulation, it is hereby ORDERED that the current briefing deadlines for the supplemental briefs on class certification and Defendant Wodjak's motion for summary judgment are amended as follows:

Supplemental briefs on whether a subclass should be certified	DUE DATE
CDR's response brief	November 2, 2020
Plaintiffs' reply brief	November 9, 2020
Submission of Plaintiffs' proposed notice place	20 days after Court's ruling on subclass issue

<b>Supplemental briefs on Wodjak's motion for summary judgment</b>	<b>DUE DATE</b>
Complete depositions on individual liability	November 20, 2020
Plaintiffs' response brief	December 11, 2020
Mr. Wojdak's reply brief	January 8, 2021

IT IS SO ORDERED.

DATED this 28th day of September, 2020.

John P. Blunt

JAMES L. ROBART  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Blythe H. Chandler, hereby certify that on September 28, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 28th day of September, 2020.  
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